



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
ONE CONGRESS STREET SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023**

March 17, 2003

OFFICE OF THE  
REGIONAL ADMINISTRATOR

Mr. Raymond Fatz  
Deputy Assistant Secretary of the Army  
Department of the Army  
Office of the Assistant Secretary of the Army  
Installation and Environment  
110 Army Pentagon  
Washington, D.C. 203010-0100

Dear Mr. Fatz:

Thank you for your letter requesting that our staffs meet to open a dialogue related to the appropriate standards for perchlorate in relation to the Massachusetts Military Reservation (MMR.) project. I fully support this dialogue and in fact believe that initial discussions have begun at the project level.

As you know, and by way of clarification, in July 2001 EPA New England issued a letter to the National Guard Bureau (NGB) establishing what was referred to as an MMR "relevant standard" for perchlorate. This level of 1.5 parts per billion (ppb) was based on an assessment of the site, and was for use on the Camp Edwards projects at MMR. The EPA's July 2001 correspondence indicated that this level "...should be used by the NGB for all future groundwater cleanup technology and alternative evaluations." In a November 2001 follow-up letter to the NGB, EPA New England further reaffirmed that the purpose of the 1.5 ppb level was to facilitate feasibility study work. This letter clarified that final decisions regarding appropriate cleanup levels for perchlorate would be made at such time that decision documents for specific Areas Of Contamination were developed. Copies of both the July and November 2001 letters referenced above are provided with this letter for your convenience.

On January 22, 2003, EPA Assistant Administrator Marianne Horinko signed a memorandum entitled "Status of EPA's Interim Assessment Guidance for Perchlorate". This guidance notes that the state of perchlorate regulation is currently in flux and lays out considerations for site managers in dealing with perchlorate contamination.

EPA New England intends to fully consider the appropriate, current guidance when establishing clean-up levels for perchlorate related to the MMR project. Given information in EPA's January 2003 guidance and the statements included regarding childhood exposures, EPA New England believes the basis of its previous 1.5 ppb "relevant standard" is no longer appropriate.

However, in order to be consistent with common practice for evaluating technologies and characterizing the nature and extent of contamination, and because we do not yet know what the final RfD will be, the NGB should continue to use current analytical capabilities of the MMR project in conducting technology assessment and site characterization. As noted above, final clean-up levels will be selected consistent with whatever guidance and regulations exist at that time.

Should you wish to discuss this further please contact me or Ira Leighton, Deputy Regional Administrator.

Sincerely,

*Signature on File*

Robert W. Varney, Administrator  
EPA New England

Enclosures

cc: Marianne Horinko  
Edward Kunce